

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
DALLAS DIVISION

GIGI'S CUPCAKES, LLC;)	
)	
Plaintiff/Counterclaim-defendant,)	Civil Action No. 3:17-cv-3009
)	Consolidated with:
v.)	3:17-cv-3010-B
)	3:17-cv-3011-B
4 BOX, LLC; NIKOLAS PAPPAS; AND)	3:17-cv-3012-B
LORAIN PAPPAS ET AL.;)	3:17-cv-3013-B
)	3:17-cv-3014-B
Defendants/Counter-claimants.)	3:17-cv-3015-B
)	3:17-cv-3016-B
v.)	3:17-cv-3017-B
)	3:17-cv-3018-B
KEYCORP, LLC; GIGI'S FRANCHISING,)	3:18-cv-2377-B
LLC; GIGI'S HOLDINGS, LLC; GIGI'S)	3:18-cv-2381-B
OPERATING, LLC; FUNDCORP, INC.;)	3:18-cv-2826-B
FOOD BUSINESS SERVICES, LLC;)	3:18-cv-2828-B
SOVRANO, LLC; ALAN THOMPSON;)	3:18-cv-2831-B
AND GINA BUTLER;)	3:18-cv-2843-B
)	3:18-cv-2846-B
Counterclaim-Defendants.)	

SUGGESTION OF BANKRUPTCY AND AUTOMATIC STAY OF PROCEEDINGS

PLEASE TAKE NOTICE that on January 4, 2019, Plaintiff/Counterclaim-Defendant, Gigi's Cupcakes, LLC, and Counterclaim-Defendants, Sovrano, LLC, and Gigi's Operating, LLC (collectively with Gigi's Cupcakes, LLC the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Texas, Fort Worth Division (the "Bankruptcy Court"). The Debtors' chapter 11 cases are pending in the Bankruptcy Court before the Honorable Judge Edward L. Morris. A copy of each Debtor's voluntary petition is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that pursuant to section 362(a) of the Bankruptcy Code, the Debtors' commencement of chapter 11 cases operates as a stay, applicable to all entities, of, among other things: (a) the commencement or continuation of a judicial, administrative, or other action or proceeding against a debtor that was or could have been commenced before the commencement of the debtor's case or to recover a claim against a debtor that arose before the commencement of the debtor's case; (b) the enforcement, against a debtor or against any property of the debtor's bankruptcy estate, of a judgment obtained before the commencement of the debtor's case; or (c) any act to obtain possession of property of or from a debtor's bankruptcy estates, or to exercise control over property of the debtor's bankruptcy estates.¹ No order has been entered in the bankruptcy case granting relief from the automatic stay.

PLEASE TAKE FURTHER NOTICE that you may obtain copies of any pleadings by visiting the Court's website at <https://ecf.uscourts.gov/> (PACER login and password required) in accordance with the procedures and fees set forth therein.

¹ Nothing herein shall constitute a waiver of the right to assert any claims, counterclaims, defenses, rights of setoff or recoupment, or any other claims of the Debtors against any party to the above-captioned case. The Debtors expressly reserves the right to contest any claims that may be asserted against the Debtors.

Dated: January 8, 2019

Respectfully submitted,

/s/ Deborah S. Coldwell

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FUND CORP, INC., FOOD BUSINESS
SERVICES, LLC, AND SOVRANO,
LLC**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was submitted for electronic filing and service through ECF, which caused counsel of record to be served by electronic means, on January 8, 2019:

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